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24 Proposed Attorneys for
25 The Roman Catholic Archbishop of San Francisco

26 UNITED STATES BANKRUPTCY COURT
27
28 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

In re:

THE ROMAN CATHOLIC
ARCHBISHOP OF SAN FRANCISCO,

Debtor and
Debtor in Possession.

Case No. 23-30564

Chapter 11

**DECLARATION OF PAUL J. PASCUZZI
IN SUPPORT OF MOTION FOR AN
ORDER ESTABLISHING PROCEDURES
AND AUTHORIZING PAYMENT OF
PROFESSIONAL FEES AND EXPENSES
ON A MONTHLY BASIS**

Date: October 12, 2023
Time: 1:30 p.m.
Place: Via ZoomGov
Judge: Hon. Dennis Montali

1 I, Paul J. Pascuzzi, declare:

2 1. I am an attorney duly licensed to practice law in the State of California and a partner
3 with Felderstein Fitzgerald Willoughby Pascuzzi & Rios LLP ("FFWPR"), the attorneys for The
4 Roman Catholic Archbishop of San Francisco the Debtor and Debtor in Possession herein
5 ("RCASF" or "Debtor"). If called as a witness, I would and could testify competently to the
6 matters stated herein.

7 2. This declaration is submitted in support of the Debtor's Motion for an Order
8 Establishing Procedures and Authorizing Payment of Professional Fees and Expenses on a
9 Monthly Basis (the "Motion"). I have read the Motion and hereby incorporate its factual
10 statements.

11 3. The Debtor retained FFWPR as its primary bankruptcy counsel. FFWPR will
12 apply for an order approving its employment as general bankruptcy counsel in this case.

13 4. FFWPR is a small Northern California firm with three partners, one full time "of
14 counsel" lawyer and one part time "of counsel." Approximately 60 percent of my time and 30
15 percent of my colleague Jason Rios' time for the period August 11 through September 11 was
16 spent on this matter. I anticipate that Mr. Rios and I will continue to devote a significant amount
17 of our time on this matter.

18 5. Waiting four months or more for any payment to FFWPR for services will cause a
19 hardship to FFWPR, as that would mean approximately one quarter of the firm's income would
20 be held up for a significant period of time. Notwithstanding this hardship, I believe that FFWPR
21 can respond to any reassessment of fees and expenses not ultimately approved by the Court.

22 6. This is a unique and complex Chapter 11 proceeding. The Debtor intends to
23 negotiate a plan of reorganization as early as possible which will: (a) allocate the RCASF's
24 remaining assets fairly among the legitimate competing interests for such property; (b) provide a
25 process to fully, fairly and expeditiously liquidate claims of abuse survivors; and (c) permit the
26 RCASF to carry on the RCASF's essential ministries and services so the RCASF can continue to
27 meet the needs of the Non-Debtor Catholic Entities, parishioners, and others who rely on the
28 RCASF's ministry, education, and charitable outreach.

7. There have been about 30 or so Catholic Diocese or Archdiocese chapter 11 cases in the United States over the years. Many of those cases follow a similar path involving global mediation with all parties in interest including the Debtor, the Committee, insurance companies and relevant related and co-defendant parties.

8. Several steps typically occur prior to beginning mediation. These include concluding all “first day” motions; exchanging information among the Debtor, Committee, insurers, and related parties; the Debtor and the Committee working together on the abuse claims noticing and filing procedures and deadlines which will be presented to the Court for approval; selection and appointment of an unknown claims representative; selection of a mediator; and mediation. The results of the mediation form the basis for the chapter 11 plan of reorganization.

9. The Debtor endeavors to work with the Committee to get to global mediation as soon as possible and will begin discussions for doing so with the Committee as soon as practicable.

10. The amount of professional activity anticipated will be quite high each month resulting in the accrual of substantial fees. Given the substantial claims to be administered in this case and the difficult issues presented in this case, the anticipated negotiations which will be required with sophisticated counsel for the creditors, tort claimants, and other entities, the complexity and uniqueness of the issues, and the potential for litigation and controversy in this case, the accrued amounts which will become owing to one or more of the Professionals will likely be significant before interim compensation could be awarded each quarter.

I declare under penalty of perjury that the foregoing is true and correct. Executed on September 19, 2023 at Sacramento, California.

/s/ Paul J. Pascuzzi
PAUL J. PASCUZZI